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October 20, 2020

By ECF

Hon. Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: *Goat Fashion Limited v. 1661, Inc.*
Docket No. 1:19-cv-11045-PAE

Dear Judge Engelmayer:

This office represents plaintiff, Goat Fashion Limited ("Plaintiff"), in the above-referenced action. We write pursuant to Section 4(B) and 6(B) of Your Honor's Individual Rules concerning redactions proposed for materials filed in connection with Plaintiff's Opposition to Defendant's Motion for Stay (filed simultaneously via ECF).

Plaintiff seeks leave to file under seal the following exhibits to the Declaration of Thomas A. Telesca in Opposition to Defendant's Motion for Stay ("Telesca Stay Opp. Decl.") based on Defendant 1661, Inc.'s designation of same as Confidential or Confidential – Attorneys' Eyes Only in their entirety pursuant to the parties' Stipulated Confidentiality Agreement and Protective Order, dated April 20, 2020 (Dkt. 24).

1. Exhibit I (customer confusion email designated as Confidential);
2. Exhibit O (pages from Eddy Lu's deposition transcript and Deposition Exhibit 96 designated as Confidential – Attorneys' Eyes Only);
3. Exhibit P (customer confusion email designated as Confidential);
4. Exhibit Q (customer confusion email designated as Confidential); and
5. Exhibit R (customer confusion email designated as Confidential).

Plaintiff also seeks leave for proposed redactions in paragraphs 13, 24, 25 and 26 of the Telesca Stay Opp. Decl. that discuss confidential information from the above-referenced exhibits.

RUSKIN MOSCOU FALTISCHEK



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Plaintiff has filed the Telesca Stay Opp. Decl, bearing confidential information in redacted, public form on ECF. Plaintiff has also provided clean and highlighted versions of the proposed redactions to the Court via email (in a clean and highlighted version).

Plaintiff respectfully requests that the court approve these proposed redactions and file and maintain the unredacted Telesca Stay Opp. Decl. and Exhibits I, O, P, Q, and R under seal, pursuant to Section 6(B).

We thank Your Honor for his time and consideration of this request.


Respectfully submitted,

Ruskin Moscou Faltischek, P.C.

By: /s/ Thomas A. Telesca
Thomas A. Telesca
Attorney for Plaintiff

Cc: All counsel (by ECF)

SO ORDERED


HON. PAUL A. ENGELMAYER
U.S. DISTRICT COURT JUDGE

October 21, 2020